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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**[PROPOSED] ORDER TO AMEND THE
DEPOSITION PROTOCOL**

Judge: Hon. James Donato

[PROPOSED ORDER]

PURSUANT TO STIPULATION, IT IS SO ORDERED that:

- 1) The Parties are bilaterally bound to the following deposition limits. All limits that apply “per side” apply to Meta Platforms, Inc., on the one hand, and User and Advertiser Plaintiffs collectively, on the other:
 - a. Each side shall be limited to a total of two hundred and sixty (260) deposition hours of the current and former employees of Meta Platforms, Inc. and there shall be a maximum of 50 witnesses deposed under this category, per side. Each deposition shall count towards the 50-deposition limit and for a minimum of three (3) hours, even if the elapsed time on the record is less than three (3) hours.
 - b. For nonparties to this action, not including former employees of Meta Platforms, Inc., the Parties shall be limited to a total of 105 deposition hours per side, with each deposition counting towards a minimum of (3) hours, even if the elapsed time on the record is less than three (3) hours.
- 2) Non-party depositions that are cross-noticed by Meta Platforms, Inc. and one or both of User and/or Advertiser Plaintiffs shall not exceed ten (10) hours total, with each side receiving up to five (5) hours of deposition time. If a lesser amount of time is negotiated for a given non-party, then the time allowed will be split equally (i.e., 50/50) between Meta Platforms, Inc., on the one hand, and one or both of Users and/or Advertisers, on the other. The Parties shall consult with cross-noticed deponents to split the deposition over a period of two (2) days, if necessary, by mutual agreement.
- 3) If one side does not notice a particular deposition, that side shall be permitted to question the deponent for up to one (1) hour at the end of primary questioning (i.e., before redirect or recross), which time shall not count towards any of the limits set forth in this stipulation.
- 4) The Parties reserve their rights to seek reasonable modifications of these terms as appropriate in individual instances and in good faith.

1 DATED: _____

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4 HON. JAMES DONATO
United States District Judge

5 Submitted by:

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ATTESTATION OF SONAL N. MEHTA

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: February 8, 2023

By: /s/ Sonal N. Mehta
Sonal N. Mehta